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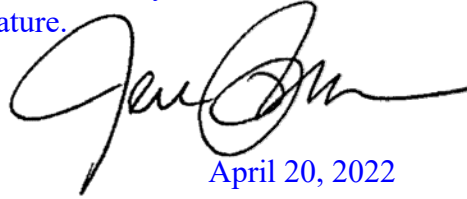
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April 19, 2022

By ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007

Application DENIED without prejudice. Defendant states that she would need to travel *if* a deal is reached to expand her restaurant concept. If she reaches such a deal, she may renew her motion. Until that time, the request is premature.



April 20, 2022

Re: *United States v. Tracii Hutson*, 21 Cr. 299

Dear Judge Furman:

Ms. Hutsona was arrested in February 2021 on a criminal complaint charging wire fraud and aggravated identity theft. She appeared remotely before a magistrate judge on March 9, 2021, and was ordered released on a \$50,000 personal recognizance bond with various conditions, including travel restrictions to the SDNY, EDNY, and District of Arizona, where she resides. On March 16, 2021, the Honorable Barbara C. Moses endorsed a memo, on consent from all parties, to modify Ms. Hutsona's bail to allow travel to the Southern District of California for employment purposes.

I write to respectfully request that the Court modify Mr. Hutsona's bail again, this time to permit her travel throughout the United States for employment purposes. Ms. Hutsona owns a restaurant, now operating in two locations. A restaurant group is interested in licensing her concept and opening franchises in various U.S. cities, including Chicago, Dallas and Atlanta. If a deal is reached, Ms. Hutsona anticipates traveling to each of these cities at least once over the next several months. Should the Court grant our request, she will provide Pretrial Services with a detailed itinerary of her travel plans. Pretrial Services consents to the modification. The government takes no position.

Thank you for your consideration.

Respectfully submitted,

/s/

Deborah Colson
(917) 543-6490 (cell)

cc: Government Counsel